

### **REMARKS**

This is in response to the May 24, 2005 first non-final Office Action.

In the above amendment, claims 1, 2, 4-6 and 19-24 are amended, claims 11-18 and 29 are cancelled and claims 30-38 are added.

#### **Claim Rejections – 35 U.S.C. §102**

On page 2, item 1 through page 7, item 20 of the May 24, 2005 non-final Office Action, claims 1-29 were rejected under 35 U.S.C. §102(b) as anticipated by Coley et al. (U.S. Patent Publication No. 2001-0011253).

Coley et al. do not disclose or suggest “a chassis comprising a plurality of card slots and a common backplane bus for connecting cards among the slots to one another” and a plurality of application cards “coupled to the system manager card over the common backplane bus” as recited in independent claims 1 and 19. Coley et al. disclose general purpose PCs connected to servers over a LAN or wide area network. The present inventions allow an application card to be swapped out of the chassis for a new application card. Features (specifically telecommunications features in new dependent claims 30, 33 and 37) can be then reallocated to the new application card, over the common backplane bus, now recited in independent claims 1 and 19. Coley et al., on the other hand, assign software applications, not features. Furthermore, Coley et al. assign software applications among general purpose desktop PCs over a LAN, not application cards in a chassis over a common backplane bus.

Dependent claims 2-18, 20-28 and 30-38 contain the limitations of their corresponding independent claims 1 or 19 and are patentable over Coley et al. for the reasons discussed above. Furthermore, dependent claims 2-18, 20-28 and 30-38 contain additional limitations which are not taught or suggested by Coley et al. For example, claims 30, 33 and 37 recite that the features are telecommunications features. Coley et al., on the other hand, disclose check-in and check-out of software applications, not telecommunications features. Claims 34 and 38 now

specifically recite a prepaid billing feature. Claims 8 and 26 also recite that each feature key comprises a plurality of feature rights including a) feature units, b) a feature category, and c) a distribution node identifier. Coley et al. do not disclose or suggest at least feature categories or distribution node identifiers by the check-in and check-out of software applications.

Accordingly, reconsideration and withdrawal of the rejection of claims 1-29 under 35 U.S.C. §102(b) over Coley et al. is respectfully requested.

**Conclusion**

All the issues in the Office Action dated May 24, 2005 have been addressed. Favorable consideration of the present application is requested. If any issues remain, the Examiner is invited to call the undersigned.

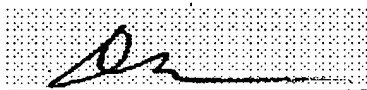
The Examiner is invited to contact the Applicants' Representative at the below-listed telephone number if there are any questions regarding this communication.

Respectfully submitted,

WILLIAM V VROMAN ET AL..

By their Representatives,

By



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